

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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BOB MARTIN
Commissioner

July 9, 2015

Judith Enck, Administrator
U.S. Environmental Protection
Agency Region 2
290 Broadway
New York, NY 10007-1866

Re: Nomination for National Priorities List of Superfund Sites
Former Kil-Tone Company
527 East Chestnut Street
City of Vineland, Cumberland County
NJDEP/SRP PI#648249

Dear Ms. Enck:

The New Jersey Department of Environmental Protection (NJDEP) nominates the former Kil-Tone Company site in the City of Vineland, Cumberland County for inclusion on the National Priorities List (NPL) of Superfund sites. Elevated levels of arsenic and lead contamination found in soil at commercial and residential properties associated with the Kil-Tone Company's former pesticide operations require further immediate and long-term actions to protect public health. Significant arsenic and lead contamination in sediment and surface water also were measured in a waterway leading from the former Kil-Tone Company site to the Maurice River.

NJDEP referred the former Kil-Tone Company site to the U.S. Environmental Protection Agency (EPA) on November 14, 2014 for removal action consideration under the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). EPA accepted the referral and initiated additional sampling to confirm NJDEP results and investigate additional properties.

NJDEP soil sampling in August 2014 in the area of the former Kil-Tone Company site, an active Vineland pesticide plant for many years during the 1910s through the 1930s, found elevated levels of arsenic at 12 residential and commercial properties, nine of which exhibited surface (0-6 inch) contamination above state cleanup standards. Elevated levels of lead contamination were found in soil at six residential and commercial properties, five of which also exhibited arsenic contamination. NJDEP conducted the site investigation work under an EPA grant at the former Kil-Tone Company site and adjacent properties. The former Kil-Tone Company site is owned by

Urban Manufacturing LLC, also known as Urban Sign and Crane, which purchased the property in 2008 for the manufacturing of commercial signs.

EPA conducted sampling in January and February 2015 at 27 residential properties located closest to the former Kil-Tone Company site. Results of this sampling indicated elevated concentrations of lead and arsenic exceeding EPA's removal management levels and state cleanup standards in the surface soils at 19 of the 27 residential properties sampled. EPA plans to install interim remedies during summer 2015 that will include a temporary soil and grass cover and also provide raised garden beds. The interim action will be taken on 18 properties that are closest to the former Kil-Tone Company site until a more permanent action can be taken to address the elevated arsenic and lead concentrations. EPA also conducted sediment, flood plain and surface water sampling along the Tarkiln Branch and portions of the Parvin Branch that found elevated arsenic and lead contamination from the former Kil-Tone Company site along the tributaries of the Maurice River.

The former Kil-Tone Company manufactured arsenic-based pesticides at the Vineland site from the late 1910s until the late 1930s. John Lucas & Company, Inc. acquired the former Kil-Tone Company in the 1920s, forming Lucas Kil-Tone Co., which eventually became a subsidiary of Sherwin Williams Co. in the 1930s. NJDEP will work with EPA to ensure potential responsible parties are identified and pursued to conduct and fund all required remedial actions for this site.

NJDEP requests EPA Region 2's Emergency and Remedial Response Division expand upon past removal assessment studies at the former Kil-Tone Company site to fully delineate soil and ground water contamination and implement appropriate permanent measures to protect human health and ensure safe reuse of the commercial and residential properties. Due to the scope of remedial work anticipated to investigate and clean up arsenic and lead contamination in soil, sediment, groundwater and surface water, it is appropriate that the former Kil-Tone Company site be proposed for the NPL.

NJDEP appreciates the opportunity to participate in the decision-making process to nominate the former Kil-Tone Company site for NPL status and is looking forward to future cooperation with EPA during remedial work at the site.

Sincerely,

Bob Martin
Commissioner

- C: Mark J. Pedersen, Assistant Commissioner, DEP, Site Remediation Program
Kenneth J. Kloo, Director, DEP, Division of Remediation Management
Walter Mugdan, Director, EPA, Emergency and Remedial Response Division
Angela Carpenter, Deputy Director, EPA, Emergency and Remedial Response Division